

BDM:AFM/CWE/ANR
F. #2021R01001

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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In re the Seizure of:

SUBJECT DOMAIN NAMES:

Z-LIB.ORG
B-OK.CC
SINGLELOGIN.APP
1LIB.DOMAINS
MY-NS.ORG
BOOKMAIL.ORG

TO BE FILED UNDER SEAL

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR
SEIZURE WARRANTS**

Case No. 22-MJ-1197

and MIRROR OR REDIRECT SUBJECT
DOMAINS

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

BRETT DOHNAL, being first duly sworn, hereby deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such:

1. I am a Special Agent with the FBI and have been since February 2012.

I am responsible for conducting and assisting in investigations involving cybercrime. I have investigated and otherwise participated in numerous matters during the course of which I have conducted physical surveillance, interviewed witnesses, executed court-authorized search warrants and used other investigative techniques to secure relevant information. As a result of my training and experience, I am familiar with the techniques and methods of operation used

by individuals involved in criminal activity to conceal their activities from detection by law enforcement authorities.

2. This affidavit is made in support of an application for seizure warrants for the following domain names:

- a. Z-LIB.ORG (the “Z-Library Subject Domain”);
- b. B-OK.CC (the “Books Subject Domain”);
- c. SINGLELOGIN.APP (the “Sign In/Up Subject Domain”);
- d. 1LIB.DOMAINS (the “1 Lib Subject Domain”);
- e. BOOKMAIL.ORG (the “Bookmail Subject Domain”)
- f. MY-NS.ORG (the MY-NS Subject Domain”); and
- g. all of the domains listed in Attachments A-1, A-2, A-3, A-4 and A-5 hereto (collectively, the “Attachments”) hereto, each of which either replicates the content of, or redirects browsers toward, the above domains (the “Mirror or Redirect Subject Domains”)

(items a. through g. collectively, the “Subject Domain Names”). The Subject Domain Names fall under the authority of the following top-level domain administrators and/or registrars, as set forth in greater detail below: VeriSign, Inc., 12061 Bluemont Way, Reston, Virginia 20190; Public Interest Registry, 1775 Wiehle Avenue, Suite 100 Reston, Virginia 20190; GoDaddy, Inc., 14455 N. Hayden Road, Suite 219 Scottsdale, Arizona 85260; Tucows, Inc., 10400 NE 4th Street, 5th Floor, Suite 121 Bellevue, Washington 98004; and 101 Domains 3220 Executive Ridge, Suite 101 Vista, California 92081 (collectively, the “Registries and Registrars”).

3. This affidavit is based upon my personal involvement in this investigation, my review of the investigative file, my training and experience, my consultation

with experts in cybercrime and copyright infringement, and reports made to me by witnesses and other law enforcement officers involved in the investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause for obtaining seizure warrants, I have not included each and every fact known to me concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, such statements are set forth in substance and in part, unless otherwise indicated.

4. As set forth below, there is probable cause to believe that the Subject Domain Names are subject to forfeiture pursuant to 18 U.S.C. § 2323, as property that was used or intended to be used to commit or to facilitate a violation of 17 U.S.C. § 506(a)(1)(A).

STATUTORIAL FRAMEWORK

5. Pursuant to 17 U.S.C. § 506(a)(1), whoever “willfully infringes a copyright” is subject to criminal punishment.
6. Pursuant to 18 U.S.C. §§ 2323(a)(1)(B) and 2323(b)(1), the following categories of property are subject to forfeiture, among others: “[a]ny property used, or intended to be used, in any manner or part to commit or facilitate the commission of” criminal copyright infringement.
7. Pursuant to Title 18, United States Code, Section 981(b) and Title 21, United States Code, Section 853(f), this Court is empowered to issue a seizure warrant for any property subject to forfeiture.

DEFINITIONS AND TECHNICAL BACKGROUND

8. **Internet Protocol Address:** An Internet Protocol address (IP address) is a unique numeric address used by computers on the Internet. An IP Address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer

attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. An IP address acts much like a home or business street address -- it enables computers connected to the Internet to properly route traffic to each other. The assignment of IP addresses to computers connected to the Internet is controlled by Internet Service Providers (“ISPs”).

9. Domain Name: A domain name is a simple, easy-to-remember way for humans to identify computers on the Internet, using a series of characters (e.g., letters, numbers, or other characters) that correspond with a particular IP address. For example, “usdoj.gov” and “cnn.com” are domain names.

10. Domain Name System: The domain name system (“DNS”) is, among other things, a hierarchical convention for domain names. Domain names are composed of one or more parts, or “labels,” that are delimited by periods, such as “www.example.com.” The hierarchy of domains descends from right to left; each label to the left specifies a subdivision, or subdomain, of the domain on the right. The right-most label conveys the “top-level” domain. For example, the domain name “www.example.com” means that the computer assigned that name is in the “.com” top-level domain, the “example” second-level domain, and is the web server.

11. Domain Name Servers: DNS servers, or “name servers,” are computers connected to the Internet that convert, or resolve, domain names into Internet Protocol (“IP”) addresses.

12. Registry: For each top-level domain (such as “.com”), there is a single company, called a “registry,” that determines which second-level domain resolves to which IP

address. For example, the registry for the “.com” and “.net” top-level domains are VeriSign, Inc., which has its headquarters at 12061 Bluemont Way, Reston, Virginia.

13. Registrar & Registrant: Domain names may be purchased through a registrar, which acts as the intermediary between the registry and the purchasers of the domain name. The individual or business that purchases, or registers, a domain name is called a “registrant.” Registrants control the IP address, and thus the computer, to which their domain name resolves. Thus, a registrant may easily move a domain name to another computer anywhere in the world. Typically, a registrar will provide a registrant with the ability to change the IP address to which a particular IP address resolves through an online interface. Registrars typically maintain customer and billing information about the registrants who used their domain name registration services.

THE INVESTIGATION

14. Since in or about November 2021, law enforcement has been conducting an investigation into an ebook piracy website known as Z-Library, which is operated by Anton Napolksky, also known as “Anton Napolkskiy,” and Valeria Ermakova.

A. Background Regarding Z-Library

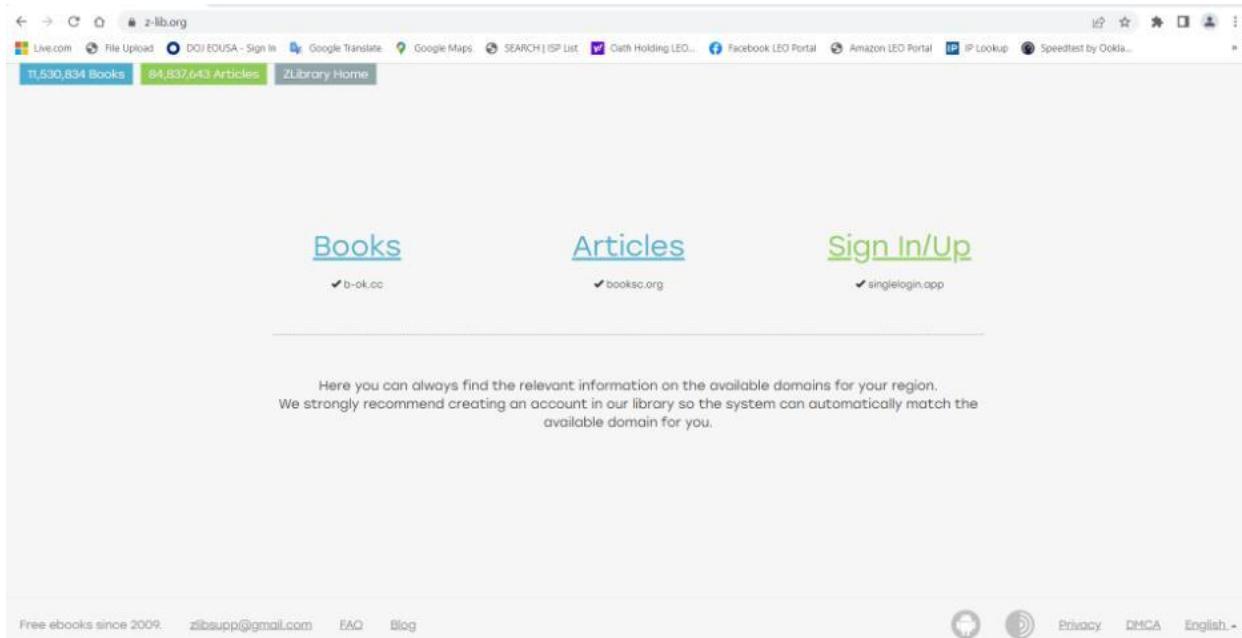
15. Z-Library is a website that bills itself as “the world’s largest library” and claims to offer millions of ebooks for download. Z-Library has been active since approximately 2009. It offers copyright-protected ebook files in a variety of file formats and encourages users to upload and download titles.

16. Many of the ebooks offered by Z-Library are protected intellectual property for which authors hold copyrights and publishers hold exclusive distribution rights, and which Z-Library has no right or license to distribute. As such, a central purpose of Z-

Library is allowing users to download copyrighted ebooks for free in violation of U.S. copyright law, as set forth in the criminal complaint attached hereto as Attachment B, which is incorporated herein by reference.

B. The Subject Domains

17. In order to function, Z-Library depends on a complex network of approximately 249 interrelated domains. For example, Z-Library’s homepage, which is accessed through the Z-Library Subject Domain, displays links to three different domains in the center of the page: “Books,” which is accessed through the Books Subject Domain, “Articles,” and “Sign In/Up,” which is accessed through the Sign-In/Up Subject Domain. A screenshot of the homepage for the Z-Library Subject Domain is set forth below:



The three different domains described above are only a few of the many domains used by Anton Napolksy and Valeria Ermakova in furtherance of the scheme.

18. Many of Z-Library’s domains appear to be geofenced domains or “mirrors”—that is, domains that merely point to other domains in this scheme or replicate the

same data of the subject domains, often on a regional basis driven by the user's location.¹

Based on my knowledge, training, and experience, one purpose for such a structure is to achieve redundancy and thus resist efforts, whether by law enforcement or civil lawsuits, to dismantle Z-Library's digital infrastructure. The vast majority of Z-Library's "mirror" and geofenced domains have Tucows as their registrar and are set forth in the *Attachments* attached hereto.

19. Z-Library's principal non-mirror domains are as follows:
 20. **Z-Library Subject Domain.** The URL of Z-Library's internet home page is <https://z-lib.org>, the Z-Lib Subject Domain. This domain is registered through Tucows, Inc., a domain registrar with offices in Bellevue, Washington. This is the main public-facing webpage that users first encounter, and it has links to the three internal Subject Domains: "Books" (b-ok.cc), "Articles" (booksc.org), and "Sign In/Up" (singlelogin.app). This page also displays the current number of books and articles available for download, which was over 11,530,834 books and 84,837,643 articles as of October 2022. This page contains links to Z-Library's Privacy and Digital Millennium Copyright Act ("DMCA") policies and lists the support email address, zlibsupp@gmail.com, at the bottom of the page.
 21. **Books Subject Domain.** The URL of Z-Library's "Books" Subject Domain is <https://b-ok.cc>, the Books Subject Domain. This is the main domain where users can search and download ebooks from the website. This domain is registered through VeriSign, Inc. a domain registry with offices in Reston, Virginia. The Books Subject Domain is also available on various mirror websites and geofenced domains. For example,

¹ IP addresses can typically be geolocated to a given region through automated lookups.

when accessed from a U.S. IP address, the URLs b-ok.afrika, 1lib.cz, eu1lib.org, and b-ok.global all redirect to b-ok.cc. Other URLs, including 3lib.net, libolutions.net, and webbooksnow.org, do not redirect and instead render as mirrors of the b-ok.cc website, with the same titles and functionality. This page also displays the current number of books and articles available for download, has links to the Z-Library sign-in page and donation pages, as well as links to the FAQ, Blog, support, and policy pages.

22. Sign In/Up Subject Domain. The URL of Z-Library’s “Sign In/Up”

Subject Domain is <https://singlelogin.app>, the Sign In/Up Subject Domain. This domain is registered through Tucows, Inc., a domain registrar with offices in Bellevue, Washington. This is the main domain where users can sign in or create accounts for use on Z-Library’s platform. Users can visit Z-Library’s platform for books or articles and download a limited number of titles per day without creating a Z-Library account, but certain functions (including the ability to upload new files, request files, download files in a variety of file formats, or send files directly to a Kindle device) are only available to users with a Z-Library account.

23. 1 Lib Subject Domain. The URL of Z-Library’s redirect page is <https://1lib.domains>. This domain is registered through Tucows, Inc., a domain registrar with offices in Bellevue, Washington. This page does not host content but serves the purpose of redirecting users to the appropriate Books Subject Domain site depending on their IP address location. For example, if U.S.-based users initially try to navigate to the b-ok.afrika domain, they are temporarily routed to 1lib.domains and then to the b-ok.cc domain.

24. **MY-NS Subject Domain.** According to publicly available information, the authoritative name server for the majority of Z-Library domain names is found at the domain my-ns.org. The registrar of record for this domain is Tucows and the top-level domain registry is the Public Interest Registry. According to a reverse nameserver lookup, the authoritative nameservers at ns1.my-ns.org and ns2.my-ns.org support 243 unique domain names, including all of the Subject Domains.

25. **Bookmail Subject Domain.** The Subject Domain bookmail.org is used for correspondence to and from Z-Library via the Amazon Web Services (“AWS”) Simple Email Service (“SES”), a cloud-based email service. As recently as August 2022, Z-Library continued to use the email accounts support@bookmail.org, admin@bookmail.org, and mailer@bookmail.org to receive emails from users regarding donations, download or account issues, and copyright violation notifications, as well as send emails to users with rewards of account upgrades for their contributions to the service. The email address admin@book.mail.org is also used for internal communications regarding internal taskings with other engineers to improve the Z-Library service.

26. Additionally, Z-Library uses certain domains that have no independent content but serve either to mirror the Subject Domain Names listed above, or automatically route users to those domains, an action known as a “redirect.” The Mirror or Redirect Subject Domains are an integral part of the function of Z-Library. Among other functions, they permit Napolsky and Ermakova to operate Z-Library even if actions by law enforcement or other third-parties disable or take down other domains within the Z-Library network. The vast majority of the Mirror or Redirect Subject Domains have Tucows as their registrar. All of the Mirror or Redirect Subject Domains are listed in the Attachments.

SEIZURE PROCEDURE

27. The procedure by which the government will seize the Subject Domain Names is described in the Attachments hereto. As detailed in the Attachments, upon execution of each seizure warrant, the Registries and/or Registrars for the Subject Domain Names shall be directed to restrain and lock the Subject Domain Names pending transfer of all right, title, and interest in the Subject Domain Names to the United States upon completion of forfeiture proceedings to ensure that changes to the Subject Domain Names cannot be made absent court order or, if forfeited to the United States, without prior consultation with the FBI or the United States Marshals Service.
28. With respect to the Subject Domain Names, the Registries will be directed to associate the Subject Domain Names to new authoritative name servers to be designated by a law enforcement agent. The Government will then display a notice on the website to which the Subject Domain Names will resolve indicating that the site has been seized pursuant to a warrant issued by this Court.

CONCLUSION

29. Based on the facts set forth above, there is probable cause to believe that the Subject Domain Names constitute property used or intended to be used to commit or to facilitate the commission of violations of 17 U.S.C. § 506(a)(1)(A). The Subject Domain Names are therefore subject to seizure and forfeiture to the United States pursuant to 18 U.S.C. §§ 2323(a)(1)(B) and 2323(b)(1).
30. A restraining order, issued pursuant to 21 U.S.C. § 853(e), is not sufficient to guarantee the availability of the Subject Domain Names for forfeiture. Only seizing the Subject Domain Names and either blocking them or redirecting them to another

website will prevent third parties from acquiring the Subject Domain Names or continuing to access the websites associated with them in their present form, including due to the risk of registrar error.

31. Accordingly, I respectfully request that the Court issue seizure warrants pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f), authorizing the seizure of the Subject Domain Names.

32. Because each warrant will be served on the Registry or Registrar which controls the relevant Subject Domain Names (as appropriate), and the Registry or Registrar thereafter, at a time convenient to it, will transfer control of the Subject Domain Names to the government, there exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.

33. I further request that the Court order that all papers in support of this application, including the affidavit and seizure warrants, be sealed until further order of the Court, except that copies of the seizure warrants may be served at the time they are executed, and the government may provide copies of the seizure warrants and this Affidavit to any law enforcement or regulatory authorities for use in connection with the restraint, seizure and/or forfeiture of the Subject Domains, and as required by its discovery obligations, including Rule 16 of the Federal Rules of Criminal Procedure. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may give targets an opportunity to flee from prosecution, destroy or tamper with evidence,

change patterns of behavior, notify confederates, or otherwise seriously jeopardize the investigation.

Dated: Brooklyn, New York
November 4, 2022

Brett Dohnal

BRETT DOHNAL

Special Agent

Federal Bureau of Investigation

Sworn and subscribed to before me by telephone
this 4th day of November 2022

James R. Cho

HONORABLE JAMES R. CHO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

ATTACHMENT A-1

IT IS ORDERED that, with respect to the domains listed below (the “Domains”), Tucows, located at 10400 NE 4th Street, 5th Floor, Suite 121, Bellevue, Washington 98004, which is the Domains’ registrar, shall take the following actions to effectuate the seizure of the domains:

1. Take all reasonable measures to redirect the Domains to substitute servers at the direction of the Federal Bureau of Investigation, by associating the Domains to the following authoritative name-server(s) or by redirecting traffic to the Domains to the following IP addresses:
 - (a) ns1.seizedservers.com (IP address 66.212.148.117);
 - (b) ns2.seizedservers.com (IP address 66.212.148.118); or
 - (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to Tucows.
2. Prevent any further modification to, or transfer of, the Domains pending transfer of all right, title, and interest in the Domains to the United States upon completion of forfeiture proceedings, to ensure that changes to the Domains cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Federal Bureau of Investigation or United States Marshals Service.

3. Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
4. Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order. The Government may display a notice on the website to which the Domains will resolve. That notice will consist of a law enforcement emblems and the following text (or substantially similar text): “The domain has been seized by

the Federal Bureau of Investigation in accordance with a seizure warrant issued pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) by the United States District Court for the Eastern District of New York as part of a law enforcement action by the Federal Bureau of Investigation.”

I. Domains

llib.cloud
llib.domains
llib.education
llib.in
llib.limited
llib.mx
llib.net
llib.org
llib.site
llib.vip
llib.world
2lib.org
3lib.net
aellib.club
aellib.org
aellib.vip
africallib.club
africallib.vip
arllib.club
arllib.org
arllib.vip
artllib.com
artllib.org
asiallib.club
asiallib.vip
atllib.club
atllib.vip
aullib.club
aullib.org
aullib.vip
bellib.club
bellib.org
bellib.vip
bgllib.club
bgllib.org
bgllib.vip
bgllib.vip
booklist.zone
booksc.xyz
bookshome.info
bookshome.net
bookshome.org
bookshome.world
br1lib.club
br1lib.org
br1lib.vip
by1lib.club
by1lib.org
by1lib.vip
callib.club
callib.org
callib.vip
cc1lib.club
cc1lib.vip
ch1lib.club
ch1lib.vip
cl1lib.club
cl1lib.org
cl1lib.vip
cn1lib.club
cn1lib.org
cn1lib.vip
cz1lib.club
cz1lib.vip
de1lib.club
de1lib.org
de1lib.vip

dk1lib.club
dk1lib.org
dk1lib.vip
eg1lib.club
eg1lib.org
eg1lib.vip
es1lib.club
es1lib.org
es1lib.vip
et1lib.club
et1lib.org
et1lib.vip
eu1lib.club
eu1lib.org
eu1lib.vip
fr1lib.club
fr1lib.org
fr1lib.vip
glo.e.org
gr1lib.club
gr1lib.org
gr1lib.vip
hk1lib.club
hk1lib.org
hk1lib.vip
hu1lib.club
hu1lib.org
hu1lib.vip
id1lib.org
ids1lib.club
in1lib.vip
in1lib.club
ir1lib.club
ir1lib.org
ir1lib.vip
it1lib.club
it1lib.vip
jp1lib.club
jp1lib.org
jp1lib.vip
kp1lib.club
kp1lib.org
kp1lib.vip
kr1lib.club
kr1lib.org
kr1lib.vip
lat1lib.club
lat1lib.vip
libsolutions.app
libsolutions.art
libsolutions.domains
libsolutions.net
lk1lib.club
lk1lib.org
lk1lib.vip
mallib.club
mallib.org
mallib.vip
mx1lib.club
mx1lib.vip
my1lib.club
my1lib.org
my1lib.vip
my-ns.org
ng1lib.club
ng1lib.org
ng1lib.vip
nl1lib.club
nl1lib.org
nl1lib.vip
nz1lib.club
nz1lib.org
nz1lib.vip
pb1lib.club
pb1lib.org
pb1lib.vip
ph1lib.club
ph1lib.vip
pk1lib.club
pk1lib.org
pk1lib.vip
pl1lib.club
pl1lib.org
pl1lib.vip
pt1lib.club
pt1lib.org
pt1lib.vip
ru1lib.club
ru1lib.org

nullib.vip
salllib.club
salllib.org
salllib.vip
sg1lib.club
sg1lib.org
sg1lib.vip
singlelogin.app
sk1lib.club
sk1lib.vip
sing1lib.club
sing1lib.org
sing1lib.vip
th1lib.club
th1lib.org
th1lib.vip
tr1lib.club
tr1lib.org
tr1lib.vip
tw1lib.club
tw1lib.vip
ullib.club
ullib.org
ullib.vip
ua1lib.club
ua1lib.org
ua1lib.vip
ug1lib.club
ug1lib.org
ug1lib.vip
uk1lib.club
uk1lib.vip
usalib.club
usalib.org
usa1lib.vip
vn1lib.club
vn1lib.org
vn1lib.vip
webbookskeeping.app
webbookskeeping.club
webbookskeeping.com
webbookskeeping.org
webbookskeeping.vip
webbookssnow.art
webbookssnow.club
webbookssnow.how
webbookssnow.net
webbookssnow.org
za1lib.club
za1lib.org
za1lib.vip
z-lib.org
zlibrary.org

ATTACHMENT A-2

IT IS ORDERED that, with respect to the domains listed below (the “Domains”), VeriSign, Inc., 12061 Bluemont Way, Reston, Virginia 20190, which is the Domains’ registry, shall take the following actions to effectuate the seizure of the domains:

1. Take all reasonable measures to redirect the Domains to substitute servers at the direction of the Federal Bureau of Investigation, by associating the Domains to the following authoritative name-server(s) or by redirecting traffic to the Domains to the following IP addresses:
 - (a) ns1.seizedservers.com (IP address 66.212.148.117);
 - (b) ns2.seizedservers.com (IP address 66.212.148.118); or
 - (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to VeriSign.
2. Prevent any further modification to, or transfer of, the Domains pending transfer of all right, title, and interest in the Domains to the United States upon completion of forfeiture proceedings, to ensure that changes to the Domains cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Federal Bureau of Investigation or United States Marshals Service.
3. Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
4. Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order. The Government may display a notice on the website to which the Domains will resolve. That notice will consist of a law enforcement emblems and the following text (or substantially similar text): “The domain has been seized by

the Federal Bureau of Investigation in accordance with a seizure warrant issued pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) by the United States District Court for the Eastern District of New York as part of a law enforcement action by the Federal Bureau of Investigation.”

I. Domains

1lib.net
3lib.net
art1lib.com
b-ok.cc
b-ok.com
bookshome.net
libsolutions.net
webbookskeeping.cc
webbookskeeping.com
webbooksnow.net

ATTACHMENT A-3

IT IS ORDERED that, with respect to the domains listed below (the “Domains”), Public Interest Registry, 1775 Wiehle Avenue, Suite 100 Reston, Virginia 20190, which is the Domains’ registry, shall take the following actions to effectuate the seizure of the domains:

1. Take all reasonable measures to redirect the Domains to substitute servers at the direction of the Federal Bureau of Investigation, by associating the Domains to the following authoritative name-server(s) or by redirecting traffic to the Domains to the following IP addresses:
 - (a) ns1.seizedservers.com (IP address 66.212.148.117);
 - (b) ns2.seizedservers.com (IP address 66.212.148.118); or
 - (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to Public Interest Registry.
2. Prevent any further modification to, or transfer of, the Domains pending transfer of all right, title, and interest in the Domains to the United States upon completion of forfeiture proceedings, to ensure that changes to the Domains cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Federal Bureau of Investigation or United States Marshals Service.
3. Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
4. Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order. The Government may display a notice on the website to which the Domains will resolve. That notice will consist of a law enforcement emblems and the following text (or substantially similar text): “The domain has been seized by

the Federal Bureau of Investigation in accordance with a seizure warrant issued pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) by the United States District Court for the Eastern District of New York as part of a law enforcement action by the Federal Bureau of Investigation.”

I. Domains

1lib.org
2lib.org
ae1lib.org
ar1lib.org
art1lib.org
au1lib.org
be1lib.org
bg1lib.org
b-ok.org
book4you.org
bookmail.org
bookos-z1.org
booksc.org
bookshome.org
br1lib.org
by1lib.org
ca1lib.org
cl1lib.org
cn1lib.org
de1lib.org
dk1lib.org
eg1lib.org
es1lib.org
eu1lib.org
fr1lib.org
glove.org
gr1lib.org
hk1lib.org
hu1lib.org
id1lib.org
ir1lib.org
it1lib.org
jp1lib.org
kp1lib.org
kr1lib.org
lk1lib.org
ma1lib.org
my1lib.org
my-ns.org
ng1lib.org
nl1lib.org
nz1lib.org
pb1lib.org
pk1lib.org
pt1lib.org
ru1lib.org
sa1lib.org
sg1lib.org
sng1lib.org
th1lib.org
tr1lib.org
u1lib.org
ua1lib.org
ug1lib.org
us1lib.org
vn1lib.org
webbookskeeping.org
webbooksnnow.org
za1lib.org
z-lib.org
zlibrary.org

ATTACHMENT A-4

IT IS ORDERED that, with respect to the domains listed below (the “Domains”) GoDaddy, Inc., 14455 N. Hayden Road, Suite 219 Scottsdale, Arizona 85260, which is the Domains’ registrar and/or registry, shall take the following actions to effectuate the seizure of the domains:

1. Take all reasonable measures to redirect the Domains to substitute servers at the direction of the Federal Bureau of Investigation, by associating the Domains to the following authoritative name-server(s) or by redirecting traffic to the Domains to the following IP addresses:
 - (a) ns1.seizedservers.com (IP address 66.212.148.117);
 - (b) ns2.seizedservers.com (IP address 66.212.148.118); or
 - (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to GoDaddy.
2. Prevent any further modification to, or transfer of, the Domains pending transfer of all right, title, and interest in the Domains to the United States upon completion of forfeiture proceedings, to ensure that changes to the Domains cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Federal Bureau of Investigation or United States Marshals Service.
3. Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
4. Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order. The Government may display a notice on the website to which the Domains will resolve. That notice will consist of a law enforcement emblems and the

following text (or substantially similar text): “The domain has been seized by the Federal Bureau of Investigation in accordance with a seizure warrant issued pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) by the United States District Court for the Eastern District of New York as part of a law enforcement action by the Federal Bureau of Investigation.”

I. Domains

1lib.vip	cz1lib.vip
ae1lib.club	de1lib.club
ae1lib.vip	de1lib.vip
africa1lib.club	dk1lib.club
africa1lib.vip	dk1lib.vip
ar1lib.club	eg1lib.club
ar1lib.vip	eg1lib.vip
asia1lib.club	es1lib.club
asia1lib.vip	es1lib.vip
at1lib.club	et1lib.club
at1lib.vip	et1lib.vip
au1lib.club	eu1lib.club
au1lib.vip	eu1lib.vip
be1lib.club	fr1lib.club
be1lib.vip	fr1lib.vip
bg1lib.club	gr1lib.club
bg1lib.vip	gr1lib.vip
bookmail.org	hk1lib.club
br1lib.club	hk1lib.vip
br1lib.vip	hu1lib.club
by1lib.club	hu1lib.vip
by1lib.vip	ids1lib.club
ca1lib.club	ids1lib.vip
ca1lib.vip	in1lib.club
cc1lib.club	in1lib.vip
cc1lib.vip	ir1lib.club
ch1lib.club	ir1lib.vip
ch1lib.vip	it1lib.club
cl1lib.club	it1lib.vip
cl1lib.vip	jp1lib.club
cn1lib.club	jp1lib.vip
cn1lib.vip	kp1lib.club
cz1lib.club	kp1lib.vip

kr1lib.club
kr1lib.vip
lat1lib.club
lat1lib.vip
lk1lib.club
lk1lib.vip
ma1lib.club
ma1lib.vip
mx1lib.club
mx1lib.vip
my1lib.club
my1lib.vip
ng1lib.club
ng1lib.vip
nl1lib.club
nl1lib.vip
nz1lib.club
nz1lib.vip
pb1lib.club
pb1lib.vip
ph1lib.club
ph1lib.vip
pk1lib.club
pk1lib.vip
pl1lib.club
pl1lib.vip
pt1lib.club
pt1lib.vip
ru1lib.club
ru1lib.vip
sa1lib.club
sa1lib.vip
sg1lib.club
sg1lib.vip
sk1lib.club
sk1lib.vip
sng1lib.club
sng1lib.vip
th1lib.club
th1lib.vip
tr1lib.club
tr1lib.vip
tw1lib.club
tw1lib.vip
ul1lib.club
ul1lib.vip
uallib.club
uallib.vip
ug1lib.club
ug1lib.vip
uk1lib.club
uk1lib.vip
usa1lib.club
usa1lib.vip
vn1lib.club
vn1lib.vip
webbookskeeping.club
webbookskeeping.vip
webbookssnow.club
za1lib.club
za1lib.vip

ATTACHMENT A-5

IT IS ORDERED that, with respect to the domains listed below (the “Domains”) 101 Domains, 3220 Executive Ridge, Suite 101 Vista, California 92081, which is the Domains’ registrar, shall take the following actions to effectuate the seizure of the domains:

1. Take all reasonable measures to redirect the Domains to substitute servers at the direction of the Federal Bureau of Investigation, by associating the Domains to the following authoritative name-server(s) or by redirecting traffic to the Domains to the following IP addresses:
 - (a) ns1.seizedservers.com (IP address 66.212.148.117);
 - (b) ns2.seizedservers.com (IP address 66.212.148.118); or
 - (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to 101 Domains.
2. Prevent any further modification to, or transfer of, the Domains pending transfer of all right, title, and interest in the Domains to the United States upon completion of forfeiture proceedings, to ensure that changes to the Domains cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Federal Bureau of Investigation or United States Marshals Service.
3. Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
4. Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order. The Government may display a notice on the website to which the Domains will resolve. That notice will consist of a law enforcement emblems and the following text (or substantially similar text): “The domain has been seized by

the Federal Bureau of Investigation in accordance with a seizure warrant issued pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) by the United States District Court for the Eastern District of New York as part of a law enforcement action by the Federal Bureau of Investigation.”

I. Domains

b-ok.as
b-ok.lat

ATTACHMENT B

TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



**APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL**

UNITED STATES OF AMERICA

-v.-

ANTON NAPOLSKY,
also known as "Anton Napolskiy,"

22-MJ-1139

Docket Number

SUBMITTED BY: Plaintiff _____ Defendant _____ DOJ
Name: Chand Edwards-Balfour

Firm Name: USAO-EDNY

Address: 271A Cadman Plaza East
Brooklyn, NY 11201

Phone Number: 917-588-7293

E-Mail Address: chand.edwards-balfour@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES NO
If yes, state description of document to be entered on docket sheet:

MANDATORY CERTIFICATION OF SERVICE:

A.) A copy of this application either has been or will be promptly served upon all parties to this action, B.) Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: _____; or C.) This is a criminal document submitted, and flight public safety, or security are significant concerns.
(Check one)

10.21.2022

DATE

Chand Balfour

SIGNATURE

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: _____

Judge/Magistrate Judge: _____

Date Entered: _____

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

Ongoing criminal investigation

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

10/21/22

DATED: Brooklyn , NEW YORK

Chand Balfour

U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE _____

DATE

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America
v.
VALERIA ERMAKOVA

Defendant

) Case No. 22-MJ-1139

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) VALERIA ERMAKOVA
who is accused of an offense or violation based on the following document filed with the court:

Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

T. 17, U.S.C., § 506(a)(1)(A) (criminal copyright)

Abdullah

Date: 10/21/2022

Issuing officer's signature

City and state: Brooklyn, New York

Honorable Sanket J. Bulsara

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____

Weight: _____

Sex: _____

Race: _____

Hair: _____

Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America
v.
ANTON NAPOLSKY,
so known as "Anton Napolskiy,"
Case No. 22-MJ-1139

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) ANTON NAPOLSKY, also known as "Anton Napolskiy,"
who is accused of an offense or violation based on the following document filed with the court:

Indictment Superseding Indictment Information Superseding Information
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court
 Complaint

This offense is briefly described as follows:

T. 17, U.S.C., § 506(a)(1)(A) (criminal copyright)

Anita B. Brown

Digitized by srujanika@gmail.com

Locating officion's signature

New York

- 2 -

- 1 -

This warrant was received on *(date)*

, and the person was arrested on (date) _____

Date:

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____

Weight: _____

Sex: _____

Race: _____

Hair: _____

Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

KTF:AFM/CWE/ANR
F. #2021R01001

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

ANTON NAPOLSKY,
also known as "Anton Napolskiy,"

and

VALERIIA ERMAKOVA,

Defendants.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

Brett Dohnal, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between January 2019 and October 2022, both dates approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ANTON NAPOLSKY, also known as "Anton Napolskiy," and VALERIIA ERMAKOVA, together with others, did knowingly and willfully infringe a copyright for purposes of commercial advantage and private financial gain, and by the reproduction and distribution during a 180-day period ten or more copies of one or more copyrighted works having a total retail value of more than \$2,500, to wit: the unauthorized sale of copyrighted works in the form of digital books ("ebooks") on Z-Library, a digital piracy website controlled by NAPOLSKY and ERMAKOVA.

(Title 17, United States Code, Section 506(a)(1)(A); Title 18, United States Code,

Section 2)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since February 2012. I have extensive experience investigating international crimes, including money laundering and wire fraud, and tracking online subjects who have taken measures to obfuscate who they are and where they are operating. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.
2. I am participating in an investigation of the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA and others who engaged in a scheme to infringe copyrights of published books. The scheme operated through online websites that allow users to fraudulently upload and download the intellectual property of thousands of artists, including artists located within Brooklyn, Queens, and elsewhere throughout the Eastern District of New York. Based on the findings of my investigation, NAPOLSKY and ERMAKOVA are based in Russia.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware. Where the contents of documents, and the actions, statements and conversations of others are reported, they are in substance and in part, and in approximations, except where otherwise indicated.

BACKGROUND

A. Background Regarding Z-Library

3. Z-Library is a website that bills itself as “the world’s largest library” and claims to offer millions of ebooks for download. Z-Library has been active since approximately 2009 and offers copyright-protected ebook files in a variety of file formats and encourages users to upload and download titles.
 4. Many of the ebooks offered by Z-Library are protected intellectual property for which authors hold copyrights and publishers hold exclusive distribution rights, and which Z-Library has no right or license to distribute. As such, a central purpose of Z-Library is allowing users to download copyrighted books for free in violation of U.S. copyright law.
 5. The copyright crimes perpetrated by the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA through Z-Library described herein have had devastating effects on all manner of victims, including authors, publishers, authors’ estates (including ones which donate their proceeds to charity), independent bookstores, large commercial bookstores, and legitimate ebooks sellers. By making millions of copyrighted works available online for free, while encouraging users to pay for enhanced Z-Library features, Z-Library has robbed individuals of the fruits of their labor—which, for some literary works, represents years or even decades of work—for NAPOLSKY and ERMAKOVA’s personal gain, as described further below.
 6. Z-Library consists of dozens of interrelated websites. Its homepage at <https://z-lib.org> displays links to three different domains in the center of the page: “Books” (b-ok.cc), “Articles” (booksc.org), and “Sign In/Up” (singlelogin.org). A screenshot of the homepage for <https://z-lib.org> is below:

The screenshot shows the Z-Library website homepage. At the top, there are navigation links: "Books" (with a checkmark icon), "Articles" (with a checkmark icon), "Sign In/Up" (in green), and "singlelogin.org". Below these are two more links: "book4you.org" (with a checkmark icon) and "bookscc.org" (with a checkmark icon). A sidebar on the left displays user statistics: "10,122,112 Books" (in blue), "84,837,646 Articles" (in green), and "Zlibrary Home" (in grey). The main content area features a large search bar and a "Most Popular" section with book covers. A note in the sidebar states: "Here you can always find the relevant information on the available domains for your region. We strongly recommend creating an account in our library so the system can automatically match the available domain for you."

7. Z-Library book titles are accessible from United States IP addresses at the site <https://b-ok.cc>, which features a search bar and the covers of “Most Popular” titles. Users can search for books by title, author, ISBN or publisher, and they may also perform full-text searches for words and phrases.
8. Users who visit <https://b-ok.cc> can download a limited number of titles per day without creating a Z-Library account, but certain functions (including the ability to upload new files, request files, and download files in a variety of file formats) are only available to users with a Z-Library account.
9. The domains <https://b-ok.cc> and <https://bookscc.org> include “Donate” links in the upper right corner. For a donation of \$1.00 or more, users can upgrade their account to “Premium” status, which unlocks certain features, including the ability to allow users to convert their files to various formats beyond the default format, and access to relevant URLs for downloading purposes. Z-Library accepts payment via Visa, American Express, Alipay, Bitcoin, and Amazon.com gift cards.
10. Z-Library’s collection of titles appears to come from several sources, including its users, who are encouraged to upload new titles. Notably, there are online tutorials

that demonstrate how one can circumvent the copyright protections on proprietary ebook formats (such as Amazon Kindle titles) so that the formerly protected books can be recirculated and uploaded to services like Z-Library.

PROBABLE CAUSE

A. Evidence of the Defendant ANTON NAPOLSKY’s Control of Z-Library

11. Records obtained by law enforcement from Google LLC (“Google”) and Amazon, Inc. (“Amazon”) provide evidence of the defendant ANTON NAPOLSKY’s control of Z-Library.
 - a. Google Records
 12. According to Google records, the defendant ANTON NAPOLSKY has an account with Google Pay, Google’s proprietary e-payment system. The account is registered in the name “Anton Napolsky” (an alternate transliteration of NAPOLSKY’s Cyrillic name) and is associated with the email address Napolsky7@gmail.com.
 13. The defendant ANTON NAPOLSKY also appears to control a series of interrelated Z-Library email addresses. Based on my investigation, I know that donation.zlib@gmail.com, zlibdoms@gmail.com and feedback.bookos@gmail.com, are all email addresses used by Z-Library. Specifically, Z-Library has at times requested that donations be sent to variations on the email address donation.zlib@gmail.com. Feedback.bookos@gmail.com is the email address associated with Z-Library in connection with various publicly available records. In addition, the same secondary or backup email address, m-

m@mail.ru (“Napolsky Personal Email-1”)² was used to register zlibdoms@gmail.com, Napolsky7@gmail.com, and feedback.bookos@gmail.com.

14. Google records reflect that a Russian-based telephone number ending in - 2458 (“Napolsky Phone-1”) was used to register the email Napolsky7@gmail.com as well as the emails donation.zlib@gmail.com, zlibdoms@gmail.com and feedback.bookos@gmail.com.

15. Google records also reflect that the account associated with the email address feedback.bookos@gmail.com was created with the name “Z-Library Team” and feedback.bookos@gmail.com is the recovery e-mail for the account zlibsupp@gmail.com, which was created with the name “ZLibrary Support.” Similarly, zlibsupp@gmail.com is the recovery e-mail account associated with the email address zlibdonat@gmail.com, that was created with the name “Zlibrary Mailer.”

a. Amazon Records

16. Records obtained by law enforcement from Amazon also provide evidence of the defendant ANTON NAPOLSKY’s control of Z-Library. Specifically, NAPOLSKY is the owner of at least two Amazon.com accounts that are registered in his name, with the phone number as Napolsky Phone-1 and overlapping street addresses (mostly located in Saint Petersburg, Russia). One of the accounts is registered with the email address “amazon@bookmail.org,” and the other account, which is registered with Napolsky Personal Email-1, has a lengthy Amazon order history that includes at least 21 orders that were paid for using Amazon.com gift cards that originated as “donations” by users to Z-Library. Since these

² According to subscription records obtained from Google, Napolsky Personal Email-1 is the email address associated with the Google account registered with the name “Anton Napolsky.”

gift cards were originally donated to Z-Library, their value should only be available to someone who has access to Z-Library's fund of donated Amazon credit.

B. The Defendant ANTON NAPOLSKY Uses Amazon Web Services to Correspond on Behalf of Z-Library

17. Z-Library uses Amazon Web Services ("AWS") Simple Email Service for bookmail.org. According to records obtained by law enforcement from Amazon, the Simple Email Service for @bookmail.org is connected to an AWS Account ending in 4421, which is registered to the customer "Anton Napolsky" at the email address Napolsky Personal Email-1, (the "Napolsky AWS Account").

18. Based on records obtained by law enforcement from AWS, I have observed that the Napolsky AWS Account sent tens of thousands of messages from email addresses at the domain bookmail.org (the domain associated with Z-Library's customer service function) to a widely varying set of what appear to be personal email addresses, located at common personal email domains like gmail.com and aol.com, as well as more than twelve thousand email addresses at ".edu" domains, which generally denote educational institutions. Further, the Napolsky AWS Account also sent emails for account creation purposes and password resets.

19. Some of the email logs that I observed from the Napolsky AWS Account related to messages that were sent out by Z-Library and returned, or "bounced back," by the intended recipient. Such messages generally included the subject line of the original message sent from bookmail.org. Overall, more than 700 of such subject lines contained references to Z-Library, including hundreds of messages with the subject line "Z-Library – confirmation."

20. Dozens of other message subject lines included references to donations.

For example, a message that bounced back on November 27, 2021 had a subject line that included the phrase: “Z-Library (aka b-ok and 1lib) fundraising campaign. Last call (Visa cards are accepted now).”

21. Other messages appeared to reflect automated alerts requested by users about the availability of books in Z-Library’s database. For example, a message that bounced back on November 21, 2021 had the subject line “Z-Library. Notice of appearance of the book.” Another message, which bounced back on November 28, 2021, had the subject line “ZLibrary ZAlerts: new books found.” And a message from November 16, 2021 included the subject line:

“Library ZAlerts: new books found on ‘Healing.’”

22. FBI agents, acting in an undercover capacity, have requested copyrighted books from Z-Library using the service’s “send by email” function. The titles arrived, without copyright protections, as attachments to messages from the email address mailer@bookmail.org. Bookmail.org is the domain associated with emails from Z-Library’s customer service personnel.

C. Evidence of the Defendant VALERIJA ERMAKOVA’s Control of Z-Library

23. Evidence also establishes the defendant VALERIJA ERMAKOVA’s control of Z-Library and her association with the defendant ANTON NAPOLSKY.

24. Based on my investigation, I understand that an Amazon gift card donation was made to Z-Library in or around January 2021 (the “Donation”). In response, the individual who made the Donation received an email message from the account zlibsupp@gmail.com that stated, in sum and substance, that the card had been received.

25. According to records obtained by law enforcement from Amazon, the Donation was claimed by an Amazon customer account ending in -1502 (the “1502 Account”),

registered to customer “Valeria” at email address kawaiihito22@gmail.com (“Ermakova Personal Email-1”). The account was registered on November 30, 2018, and has payment methods on file, including a Visa and a Mastercard in the name of Ermakova Valeriya³ with the billing address for each of Fontanka River Embankment 24 18, St. Petersburg, Russia.

Additionally, there is a Mastercard in NAPOLSKY’s name on the 1502 Account with a billing address in New Castle, Delaware. Based on an open-source search, it appears that the address is registered to a shipping company that provides mail forwarding services.

26. Since March 20, 2019, the 1502 Account has placed more than 110 orders totaling over \$13,628.32, most of them for beauty and apparel products. The recipients of the gift cards have various email addresses, but many of the email addresses follow the naming convention “[numbers]@gmail.com” or are registered to the domain “”, indicating that they were likely “donated” by Z-Library users. Of the 110 orders on the account associated with Z-library “donated” gift cards, over 100 were shipped to “Valeriya Ermakova” or “Valeriya Yermakova” at the address Fontanka River embankment, St. Petersburg, Russia. Since these gift cards were originally donated to Z-Library, their value should only be available to someone who has access to Z-Library’s fund of donated Amazon credit.

27. Based on subscription records obtained by law enforcement from Google, the Google account associated with Ermakova Personal Email-1 logged on numerous times from IP addresses that were also used to log into the accounts associated with the email addresses zlibsupport@gmail.com and feedback.booksos@gmail.com, indicating that a single internet access

³ I believe, based on what I have learned in this investigation, that “Valeriya Ermakova” is the defendant VALERIIA ERMAKOVA and that ERMAKOVA uses slightly different spellings of her name.

point (such as a home or business internet connection) was used to log in to all three accounts.

For example, each of the accounts logged in from the IP address 5.8.39.0 as indicated below:

Account	Time Stamp
feedback.bookos@gmail.com	10/27/2021 8:48:31 AM
zlibspp@gmail.com	10/27/2021 8:55:31 AM
Ermakova Personal Email-1	10/27/2021 8:55:31 AM
zlibspp@gmail.com	10/27/2021 8:55:31 AM
feedback.bookos@gmail.com	10/30/2021 9:49:14 PM
zlibspp@gmail.com	10/30/2021 9:49:39 PM
Ermakova Personal Email-1	10/30/2021 9:49:39 PM
Ermakova Personal Email-1	10/31/2021 8:58:57 AM
zlibspp@gmail.com	10/31/2021 8:58:58 AM
Ermakova Personal Email-1	11/3/2021 3:33:39 PM
zlibspp@gmail.com	11/3/2021 3:33:36 PM
Ermakova Personal Email-1	11/6/2021 11:13:14 AM
zlibspp@gmail.com	11/6/2021 11:13:15 AM
Ermakova Personal Email-1	11/7/2021 8:23:02 PM
zlibspp@gmail.com	11/7/2021 8:23:03 PM

28. Additionally, according to records received from AWS, both the

defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA logged on to their respective

AWS account and made Amazon orders from the IP Address 5.8.39.0 interchangeably and sometimes around the same time. For example, on November 14, 2020, NAPOLSKY and

ERMAKOVA logged on to their respective AWS account from the above-referenced IP Address within approximately 26 minutes of each other and on February 6, 2021, NAPOLSKY and ERMAKOVA logged on to their respective AWS account a few hours apart.

D. Evidence of the Defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA's Control Over Z-Library and Their Collaboration

29. Based on records received from Google, including a search warrant for the accounts Ermakova Personal Email-1 and Napsky Personal Email-1 signed by the Honorable Vera M. Scanlon, United States Magistrate Judge, Eastern District of New York, law

enforcement has identified communications that show the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA's interactions with each other and Z-Library. See Magistrate Docket

Number 22-936. Some of these communications are excerpted below:

- a. On or about November 28, 2014, Napolsky Personal Email-1 received an email from adwords-noreply@google.com that was also received by support.wikilife@gmail.com and feedback.bookos@gmail.com. Google Ads (formerly Google Adwords) is an online advertising platform developed by Google, where advertisers bid to display brief advertisements, service offerings, product listings, or videos to web users. It can place ads both in the results of search engines like Google Search and on non-search websites, mobile apps, and video. This email indicates that the defendant ANTON NAPOLSKY was using the services of Google Adwords to advertise Z-Library, as excerpted below.

 **Email Message**

From: "Google AdWords" adwords-noreply@google.com
To: m-m@mail.m, support.wikilife@gmail.com
Received (GMT): 11/28/2014 08:17:48
Subject: Your AdWords account: Ads won't show due to a violation of the Ads Policy

Plain Text Body

Client ID: 724-198-9076

Hello!

One of your sites doesn't comply with our Advertising Policies. Therefore, we cannot show existing ones and will Reject new ads with a link to this site.

to resolve this issue and resume running ads follow these steps actions:

1. Make the necessary changes on the site below, which is not Complies with AdWords policies.

Display URL: bookos.org.

Policy violation: malware

Details and instructions:

<https://support.google.com/adwordspolicy/answer/1308246?hl=ru&fix>

2. Submit a request to re-check the site, following the instructions for see the link above. If we don't find any violations of AdWords policies on your site, it does will be approved.

b. On or about January 23, 2020, Napolsky Personal Email-1 received an email addressed to “Anton N.” from an internet domain service company with an invoice for renewing booksc.org for one year. An excerpt of the email is depicted below.

 **Email Message**
From: "Internet.bs" no-reply@support.internet.bs
To: m-n@mail.ru
CC: napolsky7@yandex.ru
Received (GMT): 01/23/2020 09:26:01
Subject: Invoice 5996687

Html Body

Dear Anton N.

Please find here your Invoice:

Internet Domain Service BS Corp. Ocean Centre, Montague Foresore East Bay Street, P.O. Box SS-19084 Nassau, Bahamas VAT Number: GB190030448	Books Bay 1st beach miami, 123456 miami DOMINICAN REPUBLIC
January 23, 2020- Invoice 5996687	
Product	Price
1) Renewal: booksc.org (1 year)	\$12.29

c. On or about June 12, 2019 and August 17, 2019, the email accounts admin@bookmail.org and feedback.bookos@gmail.com received emails from the email address jira@zlibrary.atlassian.net. Similarly, on or about January 10, 2022, January 14, 2022 and March 22, 2022, Ermakova Personal Email-1 received emails from the email address jira@zlibrary.atlassian.net. Atlassian Corporation Plc is an Australian software company that develops products for software developers, project managers and other software development teams, including a task management program called Jira. Updates regarding a Jira project are sent out to team members from a central, automated email account. The receipt of

these emails indicates that the defendants ANTON NAPOLSKY and VALERIA ERMAKOVA were collaborating regarding Z-Library software, and that Z-Library had an account with Atlassian Corporation Plc. Translated excerpts of the emails to Ermakova Personal Email-1 are below and indicate that the tasks ERMAKOVA requested were completed by individuals working with ERMAKOVA and NAPOLSKY.⁴

Email Message

From: "Danill Yegorov (Iura)" jira@zlibrary.atlassian.net
To: "Banepa Ermakova" kawaiihto22@gmail.com
Received (GMT): 01/10/2022 17:41:20
Subject: [JIRA] Danill Yegorov mentioned you on ZLIB-2148

[Plain Text Body](#) [HTML Body](#)

Danill Yegorov mentioned you on an issue

ZLibrary / ZLIB-2148

Add the ability for an admin to delete a collection of books downloaded by users in their entirety

Danill Yegorov 8:41 PM MSK
@Valeria Ermakova , done!

The data was indeed stopped being written because a new field was added to the table. The save was corrected. the missing data was recalculated.

Filter by user added (only now) as a search by user login. If you wish, I can change to search by mail or user id.

Solution reference: <https://stage13.book4you.org/uploader/collections.php> (stage 13)

Important: now all the new functionality (search by user and mark are available only to admins.

[View issue](#)

Email Message

From: "Danill Yegorov (Iura)" jira@zlibrary.atlassian.net
To: "Banepa Ermakova" kawaiihto22@gmail.com
Received (GMT): 01/14/2022 16:55:59
Subject: [JIRA] Danill Yegorov mentioned you on ZLIB-2148

[Plain Text Body](#) [HTML Body](#)

Danill Yegorov mentioned you on an issue

ZLibrary / ZLIB-2148

Add the ability for an admin to delete a collection of entire books uploaded by users

Danill Yegorov 7:45 PM MSK
@Valeria Ermakova , yes, the search was by login (for example, <https://stage13.book4you.org/uploader/collections.php?User=kangainigo> , there are my test collections, you can try to mark them as spam and then delete).

Redesigned the search, now collections can be searched by Id user (fastest), as well as by name and email .

Removed the spam flag

[View issue](#)

⁴ The translations contained herein are drafts.

 Email Message
From: "Alexey Zhukov (Jura)" jira@library.atlassan.net
To: "Barevna Ermakova" kawaihitto22@gmail.com
Received (GMT): 03/22/2022 05:19:12
Subject: [JIRA] Alexey Zhukov mentioned you on ZLIB-1307

[Plain Text Body](#) [Html Body](#)

Alexey Zhukov mentioned you on an issue

ZLIBray / ZLIB-1307

Implement the ability to specify the preferred format of the book file name

 Alexey Zhukov 8:19 AM MSK

@Valeria Ermakova A space is added after the tag in the input field so that you can see the cursor behind the tag (because there is no standardized behavior as browsers have to display the cursor next to the tag and they do it very differently).

In the displayed example and in the saved template, these spaces are removed, i.e. it is just a small trick to display in the input field.

[View issue](#)

d. On or about October 25, 2018, Napolisky Personal Email-1 received an email from Ermakova Personal Email-1 attaching what appears to be an electronic version of the book “Dare to Lead: Brave Work. Tough Conversations. Whole Hearts,” depicted below.



null

Time 2018-10-25T14:34:16-04:00

From kawaihitto22@gmail.com

To m-n@mail.ru

CC

BCC

Attachments  Dare To Lead _ Brave Work. Tough Conversations. Whole Hearts. — Brené Brown (2018).epub

WHEREFORE, your deponent respectfully requests that the defendants ANTON NAPOLSKY and VALERIA ERMAKOVA be dealt with according to law.

It is further requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrants. I believe that sealing this document is necessary because the warrant is relevant to an ongoing investigation and, based upon my training and experience, I have learned that criminals actively search for criminal affidavits and warrants via the internet, and disseminate them to others as they deem appropriate, e.g., by posting them publicly online. Premature disclosure of

the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness, particularly given the defendants' location overseas.



Brett Dohnal
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of this
Affidavit by reliable electronic means, pursuant to
Federal Rules of Criminal Procedure 41(d)(3) and 4.1, this
21st of October, 2022



THE HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

KTF:AFM/CWE/ANR
F.#2021R01001

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-X

UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

- against -

APPLICATION FOR SEALING
AND LIMITED UNSEALING ORDER

ANTON NAPOLSKY,
also known as "Anton Napolskiy,"

and

VALERIYA ERMAKOVA,

Defendants.

-X

1. On October 21, 2022, Magistrate Judge Sanket J. Bulsara signed a complaint and arrest warrants for the above-captioned defendants, certain of whom are currently at-large outside the United States. Should any of these defendants be arrested overseas, the government may seek extradition or expulsion from a third country into the United States. Unless and until extradition or expulsion is ordered, there is a possibility that the defendants may seek to flee to a foreign jurisdiction outside of the reach of the United States government. Accordingly, Judge Bulsara granted the government's request for the complaint and arrest warrants in this matter to be filed under seal.

2. The government hereby respectfully moves to unseal the complaint and arrest warrants for the limited purposes of disseminating the complaint and arrest warrants to law enforcement personnel, including foreign law authorities and authorities in a foreign Ministry of

Justice, as well as the U.S. Department of State, in connection with efforts to prosecute the defendants or to secure their arrests, extraditions or expulsions, and to provide the complaint to the defendants and their counsel subsequent to arrest. The government requests that the complaint and arrest warrants otherwise remain under seal.

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

Digitally signed by CHAND EDWARDS-BALFOUR
Date: 2022.10.21 09:21:51
-04:00

By:

Chand W. Edwards-Balfour
Assistant U.S. Attorney
(718) 254-6238

Dated: October 21, 2022
Brooklyn, New York

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X

UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

- against -

ANTON NAPOLSKY,
also known as "Anton Napolskiy,"
22-MJ-1139

and

VALERIIA ERMAKOVA,

Defendants.

-----X

Upon consideration of the motion filed by the United States of America by Assistant United States Attorney Chand W. Edwards-Balfour, for an Order to seal the above-captioned complaint and arrest warrants, and unseal the complaint and arrest warrants for the limited purposes of disseminating the complaint and arrest warrants to law enforcement personnel, including foreign authorities, in connection with efforts to prosecute the defendants or secure their arrests, extraditions or expulsions, and to provide the complaint and arrest warrants to the defendant and defense counsel,

IT IS HEREBY ORDERED that the complaint and arrest warrants in this matter be sealed

IT IS FURTHER ORDERED that the complaint and arrest warrants be unsealed for the limited purposes of disseminating the complaint and arrest warrants to law enforcement personnel, including foreign law authorities and authorities in a foreign Ministry of Justice, as

well as the U.S. Department of State, in connection with the efforts to prosecute the defendants or secure their provisional arrests, extraditions or expulsions, and to provide the complaint and arrest warrant to the defendants and their counsel subsequent to arrest. The complaint and arrest warrants will otherwise remain under seal.



HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

Dated: October 21, 2022
Brooklyn, New York

United States District Court
EASTERN DISTRICT OF NEW YORK

In re the Seizure of:

Z-LJB.ORG
B-OK.CC
SINGLELOGIN.APP
1LJB.DOMAINS
MY-NS.ORG
BOOKMAIL.ORG

and MIRROR OR REDIRECT SUBJECT DOMAINS

TO: The Federal Bureau of Investigation, the United States Marshals Service, and any Duty Authorized Officer or Contractor of the United States of America:

An affidavit having been made before me by Special Agent Brett Dohnal of the Federal Bureau of Investigation, who has reason to believe that the domain names listed above are subject to forfeiture to the United States

I am satisfied that the affidavit establishes probable cause to believe that the property so described is subject to forfeiture pursuant to 18 U.S.C. § 2323 and that grounds exist for the issuance of this seizure warrant pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f).

YOU ARE HEREBY COMMANDED to seize within 14 days the property specified, which domain names are registered with Tucows, located at 10400 NE 4th Street, 5th Floor, Suite 121, Bellevue, Washington 98004, by serving this warrant on Tucows.

THE ABOVE-REFERENCED REGISTRAR OR REGISTRY IS HEREBY COMMANDED to comply with all the terms of this warrant by locking and seizing the specified domain names pursuant to the conditions set out in Attachment A hereto pending further order of the Court.

Dated: Brooklyn, New York
November 4, 2022

Time: 2:28 p.m.

James R. Cho

Honorable James R. Cho
United States Magistrate Judge

ATTACHMENT A-1

IT IS ORDERED that, with respect to the domains listed below (the “Domains”), Tucows, located at 10400 NE 4th Street, 5th Floor, Suite 121, Bellevue, Washington 98004, which is the Domains’ registrar, shall take the following actions to effectuate the seizure of the domains:

1. Take all reasonable measures to redirect the Domains to substitute servers at the direction of the Federal Bureau of Investigation, by associating the Domains to the following authoritative name-server(s) or by redirecting traffic to the Domains to the following IP addresses:
 - (a) ns1.seizedservers.com (IP address 66.212.148.117);
 - (b) ns2.seizedservers.com (IP address 66.212.148.118); or
 - (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to Tucows.
2. Prevent any further modification to, or transfer of, the Domains pending transfer of all right, title, and interest in the Domains to the United States upon completion of forfeiture proceedings, to ensure that changes to the Domains cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Federal Bureau of Investigation or United States Marshals Service.

3. Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
4. Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order. The Government may display a notice on the website to which the Domains will resolve. That notice will consist of a law enforcement emblems and the following text (or substantially similar text): “The domain has been seized by

the Federal Bureau of Investigation in accordance with a seizure warrant issued pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) by the United States District Court for the Eastern District of New York as part of a law enforcement action by the Federal Bureau of Investigation.”

I. Domains

llib.cloud
llib.domains
llib.education
llib.in
llib.limited
llib.mx
llib.net
llib.org
llib.site
llib.vip
llib.world
2lib.org
3lib.net
aellib.club
aellib.org
aellib.vip
africallib.club
africallib.vip
arllib.club
arllib.org
arllib.vip
artllib.com
artllib.org
asiallib.club
asiallib.vip
atllib.club
atllib.vip
aullib.club
aullib.org
aullib.vip
bellib.club
bellib.org
bellib.vip
bgllib.club
bgllib.org
bgllib.vip
bgllib.vip
booklist.zone
booksc.xyz
bookshome.info
bookshome.net
bookshome.org
bookshome.world
br1lib.club
br1lib.org
br1lib.vip
by1lib.club
by1lib.org
by1lib.vip
callib.club
callib.org
callib.vip
cc1lib.club
ch1lib.club
ch1lib.vip
cl1lib.club
cl1lib.org
cl1lib.vip
cn1lib.club
cn1lib.org
cn1lib.vip
cz1lib.club
cz1lib.vip
de1lib.club
de1lib.org
de1lib.vip

dk1lib.club
dk1lib.org
dk1lib.vip
eg1lib.club
eg1lib.org
eg1lib.vip
es1lib.club
es1lib.org
es1lib.vip
et1lib.club
et1lib.org
et1lib.vip
eu1lib.club
eu1lib.org
eu1lib.vip
fr1lib.club
fr1lib.org
fr1lib.vip
glo.e.org
gr1lib.club
gr1lib.org
gr1lib.vip
hk1lib.club
hk1lib.org
hk1lib.vip
hu1lib.club
hu1lib.org
hu1lib.vip
id1lib.org
ids1lib.club
in1lib.vip
in1lib.club
ir1lib.club
ir1lib.org
ir1lib.vip
it1lib.club
it1lib.vip
jp1lib.club
jp1lib.org
jp1lib.vip
kp1lib.club
kp1lib.org
kp1lib.vip
kr1lib.club
kr1lib.org
kr1lib.vip
lat1lib.club
lat1lib.vip
libsolutions.app
libsolutions.art
libsolutions.domains
libsolutions.net
lk1lib.club
lk1lib.org
lk1lib.vip
mallib.club
mallib.org
mallib.vip
mx1lib.club
mx1lib.vip
my1lib.club
my1lib.org
my1lib.vip
my-ns.org
ng1lib.club
ng1lib.org
ng1lib.vip
nl1lib.club
nl1lib.org
nl1lib.vip
nz1lib.club
nz1lib.org
nz1lib.vip
pb1lib.club
pb1lib.org
pb1lib.vip
ph1lib.club
ph1lib.vip
pk1lib.club
pk1lib.org
pk1lib.vip
pl1lib.club
pl1lib.org
pl1lib.vip
pt1lib.club
pt1lib.org
pt1lib.vip
ru1lib.club
ru1lib.org

nullib.vip
salllib.club
salllib.org
salllib.vip
sg1lib.club
sg1lib.org
sg1lib.vip
singlelogin.app
sk1lib.club
sk1lib.vip
sng1lib.club
sng1lib.org
sng1lib.vip
th1lib.club
th1lib.org
th1lib.vip
tr1lib.club
tr1lib.org
tr1lib.vip
tw1lib.club
tw1lib.vip
ullib.club
ullib.org
ullib.vip
ua1lib.club
ua1lib.org
ua1lib.vip
ug1lib.club
ug1lib.org
ug1lib.vip
uk1lib.club
uk1lib.vip
usalib.club
usalib.org
usa1lib.vip
vn1lib.club
vn1lib.org
vn1lib.vip
webbookskeeping.app
webbookskeeping.club
webbookskeeping.com
webbookskeeping.org
webbookskeeping.vip
webbookssnow.art
webbookssnow.club
webbookssnow.how
webbookssnow.net
webbookssnow.org
za1lib.club
za1lib.org
za1lib.vip
z-lib.org
zlibrary.org